



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

21 MAR 1991

CERTIFIED MAIL NO. P 347535113
RETURN RECEIPT REQUESTED

Mr. Walt Mills
Acting Area Director
Bureau of Indian Affairs
Navajo Area Office
Window Rock
Navajo Nation, Arizona 86515

Re: Request for Information Pursuant to Section 104(e)
of CERCLA and Section 3007 of RCRA

Dear Mr. Mills:

BACKGROUND

The United States Environmental Protection Agency (EPA) is currently investigating the source, extent and nature of the release or threatened release of hazardous substances, pollutants or contaminants, or hazardous wastes on or about the Bluewater Uranium Mining Sites, hereinafter referred to as the "Sites". The Sites are located approximately five miles west of Prewitt, New Mexico, and 28 miles southeast of the Eastern boundary of the Navajo Nation Reservation, in the Haystack Chapter.

The Sites are located on four Indian Allotments and a one parcel of Federal land which is administered by the Bureau of Indian Affairs. Specific information regarding each of the five Sites is contained below:

Allottee:	Brown Vandever	Allottee:	Nanabah Vandever
Allotment No:	077031	Allotment No:	059419
Section:	18	Section:	24
Range:	10W	Range:	11W
Township:	13N	Township:	13N

Allottee:	Walter Vandever	Allottee:	Na ta nah gah Esedero (John Desidero)
Allotment No:	077411	Allotment No:	059387
Section:	13	Section:	26
Range:	11W	Range:	10W
Township:	13N	Township:	13N

Permitter:	Dept. of Interior, Bureau of Indian Affairs
Section:	13
Range:	11W
Township:	13N

On October 3, 1990, the EPA Region IX Emergency Response Section was notified by the Agency for Toxic Substances and Disease Registry (ATSDR) of the potential health hazards which, in its view, were associated with the uranium mine pit surfaces (including former strip mining surfaces), overburden which was previously removed from such mining surfaces, and abandoned ore debris on or about the above-referenced Sites.

On November 21, 1990, the ATSDR drafted a Public Health Advisory concerning the Bluewater Sites, based on the potential health hazards and adverse environmental consequences which it believed were associated with radiation and radionuclide levels found at the Sites. A copy of the final ATSDR Public Health Advisory is enclosed.

On November 15-17, 1990, the EPA Emergency Response Section conducted a preliminary assessment of the Sites. At that time, a gamma radiation survey was completed, and soil, air, and water samples were collected for radionuclide analysis. The data obtained during the preliminary assessment indicated that radiation and radionuclide levels recorded at the various sampling locations at the Sites exceeded the promulgated standards for soil and air.

The current EPA investigation requires inquiry into the identification, nature, and quantity of materials that have been or are generated, stored, treated, or disposed of at, or transported to the Sites. In addition, EPA is seeking information regarding the nature and extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from the Sites. The EPA investigation also requires inquiry into the ability of responsible parties to finance or to perform cleanup activities undertaken at the Sites.

SECTION 104(e) REQUEST FOR INFORMATION

EPA believes that the Bureau of Indian Affairs is in possession of information that is relevant to our investigation of the Bluewater Uranium Mining Sites mentioned above. Therefore, pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA), 42 U.S.C. Section 9604(e), EPA requests that you respond to the questions set forth in the enclosed Request for Information. In addition, EPA requests that you provide copies of all documents that your agency possesses or has access to regarding the disposal of wastes at the above-referenced Sites.

Your compliance with the enclosed Request for Information is **mandatory**. Failure to respond to this request completely and truthfully within twenty (20) calendar days of receipt of this letter, or to adequately justify such failure to respond, may result in further action by EPA pursuant to CERCLA. In this regard, please be advised that the provision of false, fictitious, or fraudulent

fraudulent statements or representations is punishable by criminal penalties of up to ten thousand dollars (\$10,000) or up to five (5) years imprisonment, or both, under 18 U.S.C. Section 1001.

This Request for Information is directed to the U.S. Department of the Interior, Bureau of Indian Affairs, its officers and employees, including any and all divisions and facilities of the BIA which may possess information pertinent to this inquiry, and the officers and employees of such divisions and facilities. This Request for Information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Your response to this Request for Information should be mailed to:

William J. Weis III
Emergency Response Section
U.S. Environmental Protection Agency, H-8-3
75 Hawthorne Street
San Francisco, CA 94105

Please direct any legal questions you may have to Linda Wandres of the Region IX Office of Regional Counsel, at (415) 744-1359, or FTS 484-1359. If you have any technical questions, please contact William J. Weis III of the Emergency Response Section, at (415) 744-2297, or FTS 484-2297.

Due to the seriousness of the problem at the Sites and the legal ramifications of your failure to respond promptly and properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Request for Information within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,



Jerry Clifford
Deputy Director for Superfund
Hazardous Waste Management Division

Enclosures

cc: (w/o ATSDR Advisory)
Jenny Denetsoni, BIA Realty Officer
Bill Allen, Regional Environmental Assistant, DOI
Ray Churan, Regional Environmental Officer, DOI
Mary Josie Smith, Chief, Hazardous Waste Materials
Division, DOI
Joanne Manygoats, Navajo Superfund Program
Louise Linkin, Navajo EPA

REQUEST FOR INFORMATION
BLUEWATER URANIUM MINING SITES

INSTRUCTIONS

1. A separate response must be made to each of the questions set forth in this Request for Information.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all contributing sources of information, including all persons and all documentary materials which you consulted in the preparation of your response.
4. EPA understands that many of the various lease documents and lease-related documents which are requested in this letter are currently being held in permanent or archival storage. EPA further understands that this permanent or archival storage may not be located at your office in Window Rock, Arizona, but instead may be located in Gallup, New Mexico, Albuquerque, New Mexico, or some other permanent document storage facility away from your office. Please be advised that EPA considers all documents which are responsive to this request, including stored or archived documents, to be extremely important to EPA's investigation of the Bluewater Mining Sites. Therefore, this Request for Information specifically pertains to and includes all such documents.
5. If information or documents not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to EPA. Moreover, should the Respondent find, at any time after the submission of its response, that any portion of the submitted information is false or misrepresents the truth, Respondent must notify EPA of this fact as soon as possible, and provide EPA with a corrected response.
6. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
7. You must respond to this Request for Information on the basis of all information and documents in your possession, custody or control, or in the possession, custody or control of your former or current employees, agents, contractors, attorneys, or other representatives.

8. If any documents requested herein have been transferred voluntarily or involuntarily to other persons, agencies or entities, or have been otherwise disposed of, identify each such document and the person to whom it was transferred, describe the circumstances surrounding each such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.
9. The information requested herein must be provided even though the Respondent contends that it possibly includes confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and 40 C.F.R. Section 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade-secret" or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this Request for Information:

1. The terms "you," "your" or "Respondent" shall mean the Department of the Interior, Bureau of Indian Affairs, and its officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, representatives and agents.
2. The term "person" shall have the same definition as in Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.

3. The term "the Sites" shall mean and include all the property described below:

Allottee: Brown Vandever
Allotment No: 077031
Section: 18
Range: 10W
Township: 13N

Allottee: Nanabah Vandever
Allotment No: 059419
Section: 24
Range: 11W
Township: 13N

Allottee: Walter Vandever
Allotment No: 077411
Section: 13
Range: 11W
Township: 13N

Allottee: Na ta nah gah Esedero (John Desidero)
Allotment No: 059387
Section: 26
Range: 10R
Township: 13N

Permittor: Department of the Interior
Bureau of Indian Affairs
Section: 13
Range: 11W
Township: 13N

4. The term "hazardous substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes all substances so designated pursuant to 40 C.F.R. Section 302, and any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, and shall include any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
6. The terms "furnish," "describe," or "provide" shall mean (1) turning over to EPA either original or duplicate copies of the requested information, where such information is in written form and is in the possession, custody, or control of the Respondent or its agents or representatives, or (2) where responsive information has not yet been memorialized in a document, reducing such information to a documentary form, and submitting that document as part of the response

to this Request for Information. If responsive information is not in your possession, custody, or control, indicate in your response where, and from whom, such information or documents may be obtained.

7. The term "identify" means, with respect to a natural person, to set forth his or her full name, present or last known business address and business telephone number, the name of that person's employer, and a description of the present or last known title and job responsibilities of such a person.
8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.
9. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (e.g., invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter thereof.
10. The term "release" has the same definition as that contained in Section 101(22) of CERCLA.
11. The term "document" means any object that records, stores, or presents information, and shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including, but not limited to, originals and all nonidentical copies of correspondence, memoranda, notes, letters, and messages (including drafts and all documents attached to, or referred to in the original document), electronic communications or records (including, but not limited to, telefaxes, telexes, and minutes, memoranda or notations of telephone and any other conversations and meetings), invoices, receipts, endorsements, checks, bank drafts, canceled checks, deposit slips, withdrawal slips, orders, record books, diaries, calendars, desk pads, notebooks, bulletins, circulars, pamphlets, statements, reports, contracts, studies, notices, analyses, comparisons, graphs, charts, interoffice or intraoffice communications, microfilm or other film records, photographs, sound recordings on any type of device, punch cards, discs, or disc packs, and tapes or other types of memory devices generally associated with computers and data processing (together with the programming instructions and other written materials necessary to use such memory storing devices.)

12. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request for Information any information which might otherwise be construed to be outside its scope.
13. The term "hazardous waste" shall have the same definition as that contained in Section 1003(5) of RCRA.
14. The term "hazardous materials" means all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined herein.
15. The term "property interest" means any interest in property, including, but not limited to, mineral rights, surface rights, any ownership interest (including an easement or any other interest less than a fee simple absolute), any interest in the rental of property, any interest in a corporation or person that owns or rents, or owned or rented property in the past, any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property in the past, any interest as either the trustee or beneficiary of a trust relationship, through which property has been managed or leased, or any other fiduciary or legally significant relationship regarding property held in trust for the benefit of specified persons.
16. The terms "transaction" or "transact" mean any sale, transfer, delivery (including the giving of a gift), or other change in ownership or change of possession.
17. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
18. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

QUESTIONS

1. For each question contained herein, identify the person(s) answering the question on behalf of the Respondent.
2. Identify all persons consulted in the preparation of the answers to these questions.
3. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide true and accurate copies of all such documents.

4. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any questions contained herein, or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that you believe they may have.
5. For each and every current owner, allottee or lessee of any portions of the Sites:
 - a. Identify each such person and the nature of their current property interest in the Sites;
 - b. Provide copies of all documents evidencing or relating to such current ownership, allotment or lease, including, but not limited to, purchase and sale agreements, deeds, leases, easements, servitudes, and other documents relating to title and property interests relating to the Sites;
 - c. Provide specific information and documentation regarding any and all current uranium mining and prospecting leases, contracts or other agreements which may have been granted in connection with property or mineral resources located on or about the Sites. The documentation to be provided to EPA with regard to such leases, contracts or agreements shall include the complete correspondence file for each such lease, contract or agreement, including, but not limited to, all correspondence, memoranda, maps, mining plans, insurance documents, security bonds, inspection reports, reclamation plans, formal and informal agreements, and all other "documents," as defined above, relating to the aforementioned leases, contracts or agreements.
6. For each and every prior operator of any portions of the Sites:
 - a. Identify each such person and the nature of their past property interest in, or operation of, the Sites;
 - b. Describe the portion of the Sites operated or leased by each such person and state the dates during which each portion was operated or leased;
 - c. Provide copies of all documents evidencing or relating to such past operation or lease, including, but not limited to, leases and lease agreements, easements, servitudes, and other documents relating to property interests in, or operation of the Sites;
 - d. Provide specific information and documentation regarding any and all past uranium mining and prospecting leases, contracts or agreements which may have been granted in connection with property and mineral resources located on or about the Sites. The documentation to be provided to EPA with

regard to such leases, contracts or agreements shall include the complete correspondence file for each such lease, contract or agreement, including, but not limited to, all correspondence, memoranda, maps, mining plans, lease agreements, insurance documents, security bonds, inspection reports, reclamation plans, formal and informal agreements, and all other "documents," as defined above, relating to the aforementioned leases, contracts or agreements.

e. Provide EPA with any and all information or evidence in your possession, or in the possession of your employees, contractors, representatives or agents, concerning the release or threatened release of hazardous materials at the Sites during the period in which the prior operator or lessee identified above had a property interest in, or operated facilities, on or about the Sites.

7. Identify all persons, including Respondent's employees, who may have knowledge, information or documents concerning the generation, use, purchase, treatment, storage, disposal or other handling of hazardous materials at, or transportation of hazardous materials to, the Sites.
8. Provide EPA with a list and brief description of all existing technical or analytical information which is in your possession, or in the possession of your employees, contractors, representatives or agents, concerning the presence or release, or threatened release, of hazardous materials on or about the Sites, and other relevant information and documentation concerning the soil, water (ground and surface), geology, geohydrology or air quality on or about the Sites.

REQUEST FOR INFORMATION

BLUEWATER URANIUM MINING SITES

INSTRUCTIONS

1. A separate response must be made to each of the questions set forth in this Request for Information.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all contributing sources of information, including all persons and all documentary materials which you consulted in the preparation of your response.
4. If information or documents not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to EPA. Moreover, should the Respondent find, at any time after the submission of its response, that any portion of the submitted information is false or misrepresents the truth, Respondent must notify EPA of this fact as soon as possible, and provide EPA with a corrected response.
5. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
6. You must respond to this Request for Information on the basis of all information and documents in your possession, custody or control, or in the possession, custody or control of your former or current employees, agents, servants, contractors, attorneys, or other representatives.
7. If any documents requested herein have been transferred voluntarily or involuntarily to other persons, agencies or entities, or have been otherwise disposed of, identify each such document and the person to whom it was transferred, describe the circumstances surrounding each such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.
8. The information requested herein must be provided even though the Respondent contends that it possibly includes confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and 40 C.F.R. Section 2.203(b), by attaching to such

information at the time it is submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade-secret" or "proprietary" or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

9. Pursuant to 40 C.F.R. Section 2.310(h), you are hereby furnished with notice of the contemplated disclosure by EPA of the information provided in response to this Request for Information to authorized representatives of EPA. Any comments on this contemplated action must be submitted to William J. Weis III at the address specified above within thirty-five (35) days of receipt of this Request for Information. The information which EPA may disclose to its authorized representatives includes any responses that your company may submit to EPA in response to this Request for Information. The authorized representative of EPA to whom EPA may disclose such information is:

PRC Environmental Management, Inc.
120 Howard Street
Suite 700
San Francisco, California 94105

The information contained in your company's response may be made available to the authorized representative of EPA for any or all of the following purposes: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of your company's response. Pursuant to 40 C.F.R. Section 2.310(h), you may submit comments to EPA regarding the Agency's disclosure of any confidential information contained in your response to EPA's authorized representative.

If you wish to claim confidentiality with regard to any portions of your response and have comments to submit to EPA regarding EPA's disclosure of such confidential information to its authorized representative pursuant to the , please indicate to EPA that you are claiming confidentiality in connection with specified portions of your response, and provide your comments, if any, to William J. Weis III along with your response to this Request for Information.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this Request for Information:

1. The terms "you," "your" or "Respondent" shall mean Santa Fe Pacific Mining Inc., and its officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, representatives and agents.
2. The term "person" shall have the same definition as in Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
3. The term "the Sites" shall mean and include all the property described below:

Allottee: Brown Vandever
Allotment No: 077031
Section: 18: SW 1/4
Range: 10W
Township: 13N

Allottee: Nanabah Vandever
Allotment No: 059419
Section: 24: NE 1/4
Range: 11W
Township: 13N

Allottee: Walter Vandever
Allotment No: 077411
Section: 13: N 1/2, N 1/2
Range: 11W
Township: 13N

Allottee: Na ta nah gah Esedero
(John Desidero)
Allotment No: 059387
Section: 26: NE 1/4
Range: 10W
Township: 13N

Permitter: Dept. of Energy
Section: 13: SE 1/4 & S 1/2 N 1/2
Range: 11W
Township: 13N

Owner: Francis Laree Fathree

Donna Jean McKinnon
Section: 19: ALL
Range: 10
Township: 13N

Owner: Elkins Real Estate
Section: 13: SW 1/4
Range: 11
Township: 13N

4. The term "hazardous substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes all substances so designated pursuant to 40 C.F.R. Section 302, and any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, and shall include any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
6. The terms "furnish", "describe", or "provide" shall mean (1) turning over to EPA either original or duplicate copies of the requested information, where such information is in written form and is in the possession, custody, or control of the Respondent or its agents or representatives, or (2) where responsive information has not yet been memorialized in a document, reducing such information to a documentary form, and submitting that document as part of the response to this Request for Information. If responsive information is not in your possession, custody, or control, indicate in your response where, and from whom, such information or documents may be obtained.
7. The term "identify" means, with respect to a natural person, to set forth his or her full name, present or last known business address and business telephone number, the name of that person's employer, and a description of the present or last known title and job responsibilities of such a person.
8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.) organization, if any, and a brief description of its business.
9. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (e.g., invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter thereof.

10. The term "release" has the same definition as that contained in Section 101(22) of CERCLA.
11. The term "document" means any object that records, stores, or presents information, and shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including, but not limited to, originals and all nonidentical copies of correspondence, memoranda, notes, letters, and messages (including drafts and all documents attached to, or referred to in, the original document), electronic communications or records (including, but not limited to, telefaxes, telexes, and minutes, memoranda or notations of telephone and any other conversations and meetings), invoices, receipts, endorsements, checks, bank drafts, canceled checks, deposit slips, withdrawal slips, orders, record books, diaries, calendars, desk pads, notebooks, bulletins, circulars, pamphlets, statements, reports, contracts, studies, notices, analyses, comparisons, graphs, charts, interoffice or intraoffice communications, microfilm or other film records, photographs, sound recordings on any type of device, punch cards, discs, or disc packs, and tapes or other types of memory devices generally associated with computers and data processing (together with the programming instructions and other written materials necessary to use such memory storing devices.)
12. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Request for Information any information which might otherwise be construed to be outside its scope.
13. The term "hazardous waste" shall have the same definition as that contained in Section 1003(5) of RCRA.
14. The term "hazardous materials" means all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined herein.
15. The term "property interest" means any interest in property, including, but not limited to, mineral rights, surface rights, any ownership interest (including an easement or any other interest less than a fee simple absolute), any interest in the rental of property, any interest in a corporation or person that owns or rents, or owned or rented property in the past, any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property in the past, or any other fiduciary or legally significant relationship regarding property held in trust for the benefit of specified persons.
16. The terms "transaction" or "transact" mean any sale, transfer, delivery (including the giving of a gift), or other change in ownership or change of possession.

17. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
18. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

QUESTIONS

1. For each question contained herein, identify the person(s) answering the question on behalf of the Respondent.
2. Identify all persons consulted in the preparation of the answers to these questions.
3. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide true and accurate copies of all such documents.
4. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any questions contained herein, or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that you believe they may have.
5. Identify the nature of the Respondent's property interest in the Sites, or any portion thereof.
 - a. Describe the portions of the Sites in which the Respondent presently has, or previously maintained such a property interest, and state the dates during which Respondent had such a property interest;
 - b. Provide copies of all documents evidencing or relating to such property interest, including, but not limited to, purchase and sale agreements, deeds, leases, easements, servitudes, contracts, correspondence, and other documents, as defined above, relating to Respondent's property interest in the Sites;
 - c. Provide specific information and documentation regarding any and all uranium mining and prospecting leases, contracts, or other agreements which may have been granted to or by Respondents in connection with property and mineral resources located on or about the Sites. The documentation to be provided to EPA with regard to such leases, contracts, or other agreements shall include the complete correspondence file for each such lease, contract or agreement, in-

cluding, but not limited to, all correspondence, memoranda, maps, mining plans, insurance documents, security bonds, inspection reports, reclamation plans, formal and informal agreements, and all other "documents," as defined above, relating to the aforementioned leases, contracts or agreements.

6. Identify the nature of the Respondent's operations and facilities at the above-referenced Sites, or any portion thereof.
 - a. Describe the portions of the Sites at which the Respondent conducted operations and/or maintained facilities, and state the dates during which Respondent conducted such operations and/or maintained such facilities at the Sites;
 - b. Did your operations at the Sites, or portions thereof, involve the recovery and/or processing of uranium ore or other natural resources located at the Sites? If so, provide a statement and any supporting documentation regarding the amount of ore and/or other resources which your company recovered and/or processed during the period of your operations at the Sites, and to whom such ore or other resources were sold.
 - c. Provide a general description of the technical process and procedural steps which were involved in the Respondent's operations at the Sites;
 - d. Provide a list of any hazardous materials used, stored, produced or exposed to the elements by the Respondent in connection with its on-Site operations;
 - e. For any hazardous materials so used, stored, produced or exposed by the Respondent on-Site, describe the quantities of each such substance which was used, stored, produced or exposed by Respondents, and with what frequency;
 - f. For any hazardous materials so used, stored, produced or exposed by the Respondent on-Site, describe how were these materials were handled, collected, treated, stored, or disposed of by Respondent.
7. Have you ever entered into an oral or written agreement, including but not limited to, a lease, contract, easement or servitude, with another person regarding the restoration or reclamation of land and/or natural resources during or following the completion of your operations at the Sites or portions thereof? If so, describe such agreement(s) and provide copies of such agreements to EPA.
8. Provide EPA with any and all information or evidence in your possession, or in the possession of your employees, contractors, representatives or agents, concerning the release or

threatened release of hazardous materials at the Sites during the period in which the Respondent had a property interest in, or operated facilities, on or about the Sites.

9. Describe the acts or omissions of any persons other than your employees, agents, or representatives, that may have caused the release or threatened release of hazardous substances at the Sites, and resulting damages, and identify all such persons. In addition:
 - a. Describe all precautions that Respondent and its employees, contractors, representatives, or agents took in an effort to respond to or to prevent foreseeable acts or omissions of third parties, as described above, and the consequences that could foreseeably result from such third party acts or omissions;
 - b. Describe the care which Respondent and its employees, contractors, representatives, or agents exercised with regard to the hazardous substances and hazardous wastes found at the Sites, including hazardous materials generated or exposed at the Sites by any third parties.
10. Identify all persons, including Respondent's employees, who may have knowledge, information or documents concerning the generation, use, purchase, treatment, storage, disposal or other handling of hazardous materials at, or transportation of hazardous materials to, the Sites.
11. Provide EPA with all existing technical or analytical information which is in your possession, or in the possession of your employees, contractors, representatives or agents, concerning the presence or release, or threatened release, of hazardous materials at or about the Sites, and other relevant information and documentation concerning the soil, water (ground and surface), geology, geohydrology or air quality on or about the Sites.
12. Describe all leaks, spills, or releases, or threats of releases (of any kind) of hazardous materials into the environment at the Sites, that have occurred or may occur in the future, including, but not limited to:
 - a. When such releases occurred or may occur;
 - b. How such releases occurred or may occur;
 - c. What hazardous materials were released or may be released;
 - d. Where such releases occurred or may occur;
 - e. Any and all activities which have been undertaken in the past in response to each such release or

threatened release;

- f. Any and all investigations of the circumstances, nature, extent or location of each such release or threatened release, including the results of any soil, water (ground or surface), or air testing that was undertaken; and
 - g. All persons who may have information relating to subparts a. through f. of this question.
- 13. Provide a scaled map of the facilities operated by the Respondent at the Sites, or portions thereof, which includes the locations of significant features. Describe the physical characteristics of the facilities, including, but not limited to:
 - a. Surface structures (e.g., buildings, tanks, etc.);
 - b. Subsurface structures (e.g., underground tanks, sumps, pits, etc.);
 - c. Ground water wells and dry wells, including drilling logs;
 - d. Any and all additions, demolitions, or changes of any kind to the property itself, and state the dates on which such changes occurred.
- 14. Identify all liability insurance policies held by Respondent from the time Respondent acquired a property interest at the Sites or began operations at the Sites (whichever is earlier) until the present. In identifying such policies, state:
 - a. The name and address of each insurer and of the insured;
 - b. The amount of coverage under each policy;
 - c. The commencement and expiration dates for each policy.In addition, submit a complete copy of each policy.
- 15. Provide a copy of the most current Articles of Incorporation and By-laws of Respondent.
- 16. Identify the managers and majority shareholders or partners of Respondent and the nature of their management duties or amount of shares held, respectively.